Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of)))
CPNI Compliance Certifications)) EB Docket No. 06-36)
) File No. EB-06-TC-060
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PAY TEL COMMUNICATIONS, INC.

CERTIFICATION OF CPNI FILING (February 6, 2006)

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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CPNI Compliance Certifications) EB Docket No. 06-36
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CERTIFICATION OF CPNI FILING (February 6, 2006)

- I, Vincent Townsend, hereby certify that:
- 1. I am President of Pay Tel Communications, Inc. ("Pay Tel"), a provider of local and long distance telecommunications services. Pay Tel specializes in providing calling services used by inmates of confinement facilities.
- 2. I have personal knowledge that Pay Tel has established the operating procedures described below. In my opinion, these operating procedures are adequate to ensure compliance with Sections 64.2001-64.2009 of the Commission's rules. 47 CFR §§ 64.2001-64.2009.
- 3. Pay Tel uses, discloses, or permits access to customer proprietary network information ("CPNI") for the purposes of providing and billing for communications-related services, protecting Pay Tel's rights or property and the security of the

confinement facility, protecting against fraudulent, abusive, or unlawful use of communications-related services, or responding to compulsory legal process.

- 4. Pay Tel does not sell or rent CPNI to other entities. Pay Tel does not make CPNI available to its sales personnel and does not currently use, disclose, or permit access to CPNI for marketing purposes.
- 6. CPNI maintained by Pay Tel is secured in password-protected data files located in a controlled-access building. CPNI data files are further protected from external access by a firewall and network security measures.
- 7. Access to CPNI data files is permitted only to authorized Pay Tel personnel and authorized officers of the confinement facility. Pay Tel employees are required to provide a written commitment to maintain the confidentiality of company information, including CPNI. Any unauthorized use, sale, or disclosure of CPNI by any employee of Pay Tel would subject the employee to disciplinary action, up to and including immediate dismissal.

Respectfully Submitted,

Vincent Townsend

President

Pay Tel Communications, Inc.